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April 29, 2015

Via Fax (918) 295-7800 and U.S. Mail

Jason Rush, Esquire
 Grant A. Fitz, Esquire
 RODOLF & TODD
 2000 Mid-Continent Tower
 401 South Boston Ave.
 Tulsa, OK 74103

Re: *Frances Harvey, Administratrix of the Estate of Earlene Frances Harvey, deceased v. Dr. Luis V. Gorospe; Wagoner Hospital Authority, d/b/a Wagoner Community Hospital; Quorum Health Resources, LLC; Jane Does I-X; and John Does I-X; in the United States District Court for the Eastern District of Oklahoma; Case No. 6:14-CV-00219-SPS*

Dear Counsel:

We would like to schedule the deposition of the corporate representative or corporate representatives of Wagoner Community Hospital. The following are the subjects on which we will need Wagoner Community Hospital to designate its corporate representative(s):

1. The recommendations made and actions taken as a result of any peer review process utilized by Wagoner Community Hospital regarding Luis V. Gorospe, M.D. ("Dr. Gorospe") prior to the date of the alleged negligence.
2. The credentialing of physicians, including Dr. Gorospe, for the conduct of bariatric surgeries, including Roux-En-Y Gastric Bypass surgery.
3. The equipment and facilities utilized or available at Wagoner Community Hospital for bariatric surgeries, including Roux-En-Y Gastric Bypass surgery and the capabilities to conduct flexible upper endoscopies.



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4. The training of nurses or other hospital staff in bariatric surgeries and recognizing and treating complications from bariatric surgeries.
5. The history of Dr. Gorospe, including any medical malpractice actions or allegations involving Dr. Gorospe.
6. The qualifications or accreditation of Wagoner Community Hospital concerning bariatric surgeries.
7. The investigation and results of any investigation respecting the competence of Dr. Gorospe before he was granted staff privileges.
8. The numbers and outcomes of bariatric surgeries, including Roux-En-Y Gastric Bypass surgeries at Wagoner Community Hospital.
9. Any instances of misconduct by Dr. Gorospe or behavior that was questioned by Wagoner Community Hospital.
10. All efforts undertaken by Wagoner Community Hospital to monitor the performance of Dr. Gorospe.
11. Any examples or instances of incompetent behavior by Dr. Gorospe.
12. Any reports of any staff, independent contractors, employees, or patients of Wagoner Community Hospital respecting Dr. Gorospe.
13. The doctors and qualifications of doctors cross-covering Dr. Gorospe's bariatric surgery patients.
14. Any consultations with Quorum Health Resources LLC regarding bariatric surgery credentialing.

We would like to schedule the deposition(s) within the next two or three weeks. I would appreciate it if you would let me know dates the corporate representative can be made available in that time frame. If I do not hear from you, I will simply pick a date and issue a Rule 30(b)(6) notice.

Sincerely,



Robert Alan Rush
For the Firm

RAR/rlw

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**cc: Tim Best, Esquire
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